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United States Department of the Interior

BUREAU OF LAND MANAGEMENT
ELKO DISTRICT OFFICE
3900 E. IDAHO STREET
P.O. BOX 831
ELKO, NEVADA 89801



IN REPLY REFER TO:
4710 (NV-015)

JUL 22 1994

Commission for the
Preservation of Wild Horses
Catherine Barcomb, Executive Director
255 W. Moana Lane, Suite 207A
Reno, NV 89509

Dear Ms. Barcomb:

The Elko District Office is in receipt of your comments to the Draft Antelope Valley Wild Horse Gather Plan. We would like to take this opportunity to address your concerns.

Comment:

The Wild Horse Amendment Environmental Assessment did not address restructuring the herd age and sex composition of this gather.

Response:

The Environmental Assessment (EA) for the Wild Horse Amendment did not include an analysis of an age selective removal. One of the objectives of the amendment was to set an initial herd size in each herd management area (HMA); the amendment did not address the methods to be used to attain this objective as those methods may change according to Nevada State policy and directives. As of this writing, the District Offices are directed to remove only adoptable animals from the public lands, which means the younger age classes. As appropriate management levels (AMLs) are attained throughout the state and as adoption demand for older horses increases, the age selective criteria may be amended.

Comment:

The Strategic Plan for Management of Wild Horses and Burros on Public Lands has no NEPA compliance document.

Response:

The Strategic Plan is not a decision document and therefore does not need to be supported by an EA or Environmental Impact Statement (EIS). The directives given in the Strategic Plan need to be supported by an EA for the specific management action.

Comment:

The Antelope Valley Herd Management Plan did not assess the gather of selective ages or sex of this draft plan.

Response:

The Antelope Valley Herd Management Area Plan (HMAP) did address the methodology of an age selective removal under B.2.b. "Maintaining AML-Discussion of Options", part ii. "Selective Removals". The associated EA for the HMAP analyzes this management action.

Comment:

The initial herd size was determined by exclusion of wild horses from checkerboard lands and not by monitoring or allotment evaluations. Allotment evaluations are to establish carrying capacities and allocate available forage to wild horses, wildlife and livestock.

Response:

The initial herd size for the Antelope Valley HMA was based on monitoring only as there are no checkerboard lands within the HMA. The initial herd size was based on a 10 percent use factor of key forage species (midpoint of slight use category) by wild horses prior to entry by livestock. This was determined to be the allowable level of use by wild horses while still not exceeding the total use of 55 percent by March 31st in areas used in common by all grazing animals.

The Wells Resource Area is in the process of writing allotment evaluations for each of the 10 grazing allotments within the Antelope Valley HMA. These allotment evaluations will further analyze data to determine if the initial herd size as determined in the Amendment is successfully maintaining a thriving natural ecological balance consistent with other multiple uses.

Comment:

Data collected in the Pequop herd can provide the necessary age, productivity and sex data for assumptions of future gathers in the Wells Resource Area. We question the assumption of 18 percent recruitment in 1994.

Response:

The Pequop wild horse removal was a very small gather of 62 animals. This small sample size would not be representative of the horse population in the Wells Resource Area. Normally, a statewide reproductive rate is used because of the reliability of a large sample size. The Wells Resource Area does have reproductive data specific to the Antelope Valley HMA. The reproductive rate, figured by the equation

$$\frac{\text{Number of animals 0-1 year of age}}{\text{Number of animals 1 year and older}}$$

was determined to be 16 percent as of a May 1994 census flight. This figure will be used in place of the 18 percent figure on page 2 of the Draft Plan, changing the approximate number of horses in the HMA from 463 to 455 and the number to be removed from 223 to 215.

Comment:

Gathering and removal of wild horses under six years will alter the age composition, survival and productivity of the herd. Release of older age class horses to the reduced herd area will increase competition with livestock.

Response:

The size of the Antelope Valley HMA did not decrease as a result of the Amendment; rather it increased from 401,500 acres to 463,540 acres as a result of adding the eastern portion of the Cherry Creek Herd Area (HA) to the Antelope Valley HMA (the western portion of the Cherry Creek HA was added to the Maverick-Medicine HMA). There will not be a resulting increase in competition with livestock due to this reduction in wild horse numbers.

As outlined in the Wild Horse and Burro Fertility Management Policy and Procedures Task Group Final Report, an age specific selective removal program would target removing approximately 90 percent of the 1 to 3 year old animals (in Antelope Valley it would be up to 4 years of age) with repeated removal every 3 years. Population modeling indicates that repeated treatments may be able to slow foal recruitment from the statewide average of 18 percent of the total population down to 10 percent. Normal age distribution would be achieved after approximately 12 years, following initial treatment.

Slowing foal recruitment is our objective and would result in fewer gathers.

The Final Report does list some negative points to this treatment, one of which is the disruptive results to the social structure of the herd. At this time we feel the positive aspects outweigh the negative aspects of an age-selective removal. The EA for the Antelope Valley Wild Horse Gather Plan adequately addresses this impact to the horse herds.

Comment:

The Amendment set a limitation of 10 percent use of winter key forage by wild horses prior to livestock turnout. This limitation cannot be met by the present density of wild horses on the new herd area. Increasing wild horse numbers will sustain utilization levels that can be used to establish an AML below the herds threshold.

Response:

The 10 percent use by wild horses prior to livestock turnout in combined winter use areas as established in the amendment is not currently being met in the Antelope Valley HMA. This is the reason the BLM is conducting a removal within the HMA. The initial herd size of 240 horses should achieve the 10 percent utilization objective. After the initial herd size is attained, continued monitoring and allotment evaluations will determine if utilization levels are proper and if a thriving natural ecological balance is being maintained.

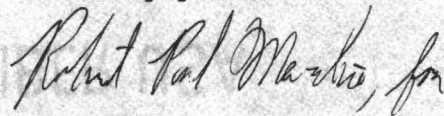
Responses to Recommendations:

The BLM followed all NEPA procedures when preparing its land use plan, policy and decisions. As further monitoring and allotment evaluations are completed, the Wells Resource Area will refine the initial herd size determined in the Wild Horse Amendment.

The productivity of older mares is well documented in J. Bergers' book (1986) Wild Horses of the Great Basin and also in R. Garrotts' thesis (1990) Demography of Feral Horse Populations in the Western United States. Both authors have found that mares in wild horse populations reach peak reproductive age between 6 and 15 years. Because these age classes will not be removed from the HMA, continued productivity of the herd is assured. Genetic diversity is not a concern in the Antelope Valley HMA as it is known that horses from the Goshute, Spruce-Peguop and Maverick-Medicine HMAs as well as the Antelope HMA in the Ely District, all intermingle with horses in the Antelope Valley HMA.

Hopefully this fully addresses your concerns. The above referenced change to the Draft Plan will be incorporated in the Final Antelope Valley Wild Horse Gather Plan. If you have further questions or comments, please contact myself or Kathy McKinstry at the above address or phone (702) 753-0200.

Sincerely yours,



BILL BAKER, Manager
Wells Resource Area